

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: JAMES CONWAY : **Chapter 7**
: **Debtor** : **Bankruptcy No. 08-13403**

**MOTION OF DISCOVER FINANCIAL SERVICES,
BY ITS ATTORNEY-IN-FACT, DALE KENNEDY of
AMERICAN PROPERTY LOCATORS, INC.,
FOR ORDER DIRECTING PAYMENT OF FUNDS IN COURT REGISTRY**

Discover Financial Services ("the Movant"), by its attorney-in-fact, Dale Kennedy of American Property Locators, Inc., requests that the court enter an order directing the payment of funds held in the court registry, on the following grounds.

1. Movant was a creditor of the Debtor in the above bankruptcy case.
2. Movant was due to receive and the Chapter 13 Trustee did, in fact, make a distribution to the Movant from the estate in the amount of \$3,779.06.
3. Movant was not located and the funds of the Movant were paid into the court pursuant to 11 U.S.C. §347.
4. Pursuant to 11 U.S.C. §§347 and chapter 129 of title 28 of the U.S. Code, the Movant requests that the Court issue an Order directing payment to the Movant. Unclaimed funds received 11-08-2011 receipt # 234275, per court records.
5. The Movant further requests that the payment be made in the name of the Movant's attorney-in-fact. Attached hereto and made a part hereof, marked as Exhibit "A", is a true and correct copy of the Limited Power of Attorney which gives Movant's attorney-in-fact the authority to act on behalf of Movant.



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